

ALEX G. TSE (CABN 152348)
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Attorneys for the United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA)	NO. CR 16-516-01 HSG
)	
Plaintiff,)	UNITED STATES' APPLICATION TO FILE
)	EXHIBITS UNDER SEAL IN ITS OPPOSITION IN
v.)	RESPONSE TO DEFENDANT'S MOTION TO
)	SUPPRESS
ANDRE MARTEL WINN,)	
)	
Defendant.)	
)	

The United States hereby requests that the Court permit it to file under seal the following items:
Exhibit 1 to Vallerger Declaration (containing sensitive law enforcement information about the
investigation of firearms trafficking and firearms tracing); and Exhibit 1 to Topper Declaration (under
seal Search Warrant 4-16-70956 DMR), which are Exhibits to Declarations filed in support of the
United States' Response in Opposition to Defendant's Motion to Suppress.

Exhibit 1 to the Vallerger Declaration tends to disclose gun tracing information and the contents
of reporting information regarding firearms purchases to the federal government. This Exhibit also
contains personal information about individuals that is required to be redacted of sealed before filing on
ECF.

U.S. APP. & ORDER
CR 16-516-01 HSG

1 Exhibit 1 to the Topper Declaration is an under seal search warrant. Although the warrant has
2 been unsealed for the limited purpose of providing it to the defense, it otherwise remains a sealed
3 document and should not be filed on the public docket.

4 Therefore, the government asks that it be permitted to file these two documents under seal,
5 except that it will provide copies of these sealed exhibits to the defense.

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7 DATED: January 31, 2018

Respectfully submitted,

8 ALEX. G. TSE
Acting United States Attorney

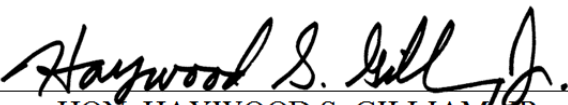
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10 /s/
BRIGID S. MARTIN
11 Assistant United States Attorney

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13 ORDER

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15 For good cause shown, IT IS ORDERED that Exhibit 1 to the Vallerger Declaration and Exhibit 1
16 to the Topper Declaration, in support of the United States' Response in Opposition to Defendant's
17 Motion to Suppress, shall be filed and maintained under seal until further order of this Court, except that
18 the government shall serve copy of these sealed exhibits on defense counsel.

19
20 IT IS SO ORDERED.

21
22 DATED: January 31, 2018

23 
HON. HAYWOOD S. GILLIAM, JR.
United States Chief District Judge